



Pharmacy e-Health Information Technology Collaborative

VIA Electronic Submission to <http://www.regulations.gov>

August 1, 2011

Michelle Shortt

Centers for Medicare & Medicaid Services

Office of Strategic Operations and Regulatory Affairs

Division of Regulations Development

Attention: Document Identifier/OMB Control Number, Room C4-26-05, 7500

7500 Security Boulevard

Baltimore,

Maryland 21244-1850.

Re: CMS-10147, CMS-10396 and CMS-R-246: Agency Information Collection
Activities: Proposed Collection; Comment Request: Medication Therapy
Management Program Improvements—Standardized Format

Dear Ms. Shortt:

On behalf of the membership of the Pharmacy e-Health Information Technology Collaborative (Collaborative), we are pleased to submit comments in response to the request for comment *Medication Therapy Management Program Improvements—Standardized Format*, (76 Fed Reg 31338) published in the *Federal Register* on May 31, 2011.

The Collaborative recommends that “data requirements” (the information or data that is required to be populated in fields of standardized formats) for medication therapy management (MTM) electronic transactions are incorporated into the “Standardized Format for the Comprehensive Medication Review Action Plan and Personal Medication List Summary”. Examples of such data fields that could be automatically populated from the pharmacy operating system into the standardized form include patient name, allergies, medications, label directions, prescriber name and phone number, pharmacist who provided MTM services name and phone number, date documents/list prepared, and indication if available. This would assure completion of the forms for the patient is driven off existing electronic data elements so that rekeying will not be necessary. This recommendation is supported through the American National Standards Institute (ANSI) Standard Development Organizations including National Council for Prescription Drug Programs (NCPDP), Accredited Standards Committee (ASC X12), and Health Level Seven (HL7) processes to assure Medication Therapy Management Services (MTMS) electronic standard transactions are developed. The Collaborative supports and works

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| 401 Holland Lane Suite 702 | Alexandria, VA, 22314 | www.pharmacyHIT.org | 571-312-2904 |

with these organizations to make certain data elements such as those in the proposed forms are populated from the “Pharmacist EHR” and or other types of interoperable electronic systems.

Furthermore, the Collaborative members’ request clarification on printing formats and if CMS expects standardized forms to be printed in the specific format as presented in the draft or if there is flexibility in how pharmacies can print the forms utilizing their software systems. The Collaborative members’ recommend that CMS consider flexibility in the format of the standardized forms and should allow an electronic media if available.


Formed in the fall of 2010, the Collaborative’s focus is to assure the meaningful use (MU) of standardized electronic health records (EHRs) support safe, efficient, and effective medication use, continuity of care, and provides access to the patient-care services of pharmacists with other members of the interdisciplinary patient-care team.

The Collaborative seeks to ensure that pharmacist-provided patient care services in all practice settings are represented in the MU of EHRs. The Collaborative’s founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative’s Associate Members represent e-prescribing networks, a standards development organization, transaction processing networks, pharmacy companies and other organizations that support pharmacists providing patient care services. The Collaborative was founded by nine pharmacy professional associations representing over 250,000 members and includes three associate members from other pharmacy related organizations. For additional information, visit www.pharmacyhit.org

The Collaborative supports Medicare Part D sponsors use pharmacists to summarize the person-to-person comprehensive medication review (CMR) and provide an individualized written or printed summary to the beneficiary. In addition, the Collaborative supports the completion of the forms should be driven off existing electronic data elements so that rekeying will not be necessary.

On behalf of the Pharmacy e-HIT Collaborative, thank you again for the opportunity to comment on the *Medication Therapy Management Program Improvements—Standardized Format* request for comments. For more information, contact Shelly Spiro, Director, Pharmacy e-HIT Collaborative at shelly@pharmacyhit.org.

Respectfully submitted,



Shelly Spiro
Director, Collaborative

Shelly Spiro, RPh
Director
Pharmacy e-Health Information Technology
Collaborative
shelly@pharmacyhit.org

Mark N. Brueckl, RPh, MBA
Assistant Director, Pharmacy Affairs
Academy of Managed Care Pharmacy
mbrueckl@amcp.org

Mike Rouse B.Pharm (Hons); MPS
Assistant Executive Director, Professional
Affairs and Director, International Services
Accreditation Council for Pharmacy
Education (ACPE)
mrouse@acpe-accredit.org

William Lang, MPH
VP Policy and Advocacy
American Association of Colleges of
Pharmacy wlang@aaccp.org

C. Edwin Webb, Pharm.D., MPH
Associate Executive Director
Director, Government and Professional
Affairs
American College of Clinical Pharmacy
ewebb@accp.com

Marcie Bough, PharmD
Senior Director, Government Affairs
American Pharmacists Association
mbough@aphanet.org

Lynne Batshon
Director, Government Affairs
American Society of Consultant Pharmacists
Lbatshon@ascp.com

Christopher J. Topoleski
Director, Federal Regulatory Affairs
American Society of Health-System
Pharmacists
ctopoleski@ashp.org

Kim Swiger, RPh
Vice President, Pharmacy Services
Mirixa Corporation
kswiger@mirixa.com

Rebecca Snead
Executive Vice President & CEO
National Alliance of State Pharmacy
Associations
rsnead@naspa.us

Ronna B. Hauser, PharmD
VP Policy and Regulatory Affairs
National Community Pharmacists
Association (NCPA)
ronna.hauser@ncpanet.org

Lynne Gilbertson
VP Standards Development
National Council for Prescription Drug
Programs (NCPDP)
lgilbertson@ncpdp.org

Stephen Mullenix, RPh
Sr VP, Communications & Industry Relations
National Council for Prescription Drug
Programs (NCPDP)
smullenix@ncpdp.org

Roger Pinsonneault, R.Ph.
Sr. Director, Business Development
RelayHealth – Pharmacy
Roger.Pinsonneault@RelayHealth.com

Ken Whittemore, Jr., RPh, MBA
Senior VP, Professional & Regulatory Affairs
Surescripts
ken.whittemore@surescripts.com